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February 27, 2009

By Electronic Filing

Ex Parte Presentation

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

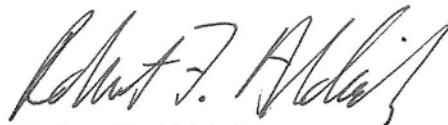
Re: EB Docket No. 06-36

Dear Ms. Dortch:

Please find enclosed a copy of the 2009 CPNI compliance certification of Pay Tel Communications, Inc.

Please contact the undersigned if you have any questions about this filing.

Sincerely,



Robert F. Aldrich

Enclosure

cc: Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 27, 2009

Name of company covered by this certification: Pay Tel Communications, Inc.

Form 499 Filer ID: 802377

Name of signatory: Vincent Townsend

Title of signatory: CEO

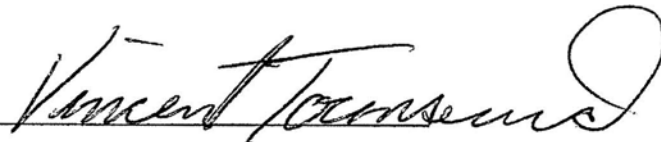
I, Vincent Townsend, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that in my opinion are adequate to ensure compliance with the Commission's customer proprietary network information ("CPNI") rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



PAY TEL COMMUNICATIONS, INC.
STATEMENT OF CPNI PROCEDURES

1. Pay Tel maintains customer proprietary network information (“CPNI”) in connection with its provision of telephone services to correctional facilities for the use of inmates of such facilities. Pay Tel uses, discloses, or permits access to CPNI as required by law. Pay Tel also uses, discloses, or permits access to CPNI for the purposes of providing and billing for communications-related services, protecting Pay Tel’s rights or property and the security of the confinement facility, and protecting against fraudulent, abusive, or unlawful use of communications-related services.

2. Pay Tel does not sell or rent CPNI to other entities. Pay Tel does not make CPNI available to its sales personnel and does not use, disclose, or permit access to CPNI for marketing purposes.

3. CPNI maintained by Pay Tel is secured in password-protected data files located in a controlled-access building. CPNI data files are further protected from external access by a firewall and network security measures.

4. Access to CPNI data files is permitted only to authorized Pay Tel personnel and authorized officers of the confinement facility. Pay Tel employees are required to provide a written commitment to maintain the confidentiality of company information, including CPNI. Any unauthorized use, sale, or disclosure of CPNI by any employee of Pay Tel would subject the employee to disciplinary action, up to and including immediate dismissal.

5. Pay Tel does not disclose CPNI in response to customer-initiated telephone contact or online access, unless the customer provides a pre-established password that has been authenticated without the use of readily available biographical information or account

information, except that Pay Tel may provide CPNI by calling the customer at the customer's telephone number of record or sending the information to the customer's address of record.